UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

LISA BIRON)	
)	
V.)	Case No. 1:16-CV-00108-PB
)	
UNITED STATES OF AMERICA)	
)	
)	

ASSENTED-TO MOTION TO EXTEND STAY

NOW COMES the Movant, Lisa Biron, by and through her counsel, Wilson, Bush, Durkin & Keefe, P.C. ("the Defendant"), and requests that this Honorable Court grant an additional six-month extension of the stay of the proceedings pursuant to her Motion Under 28 U.S.C. § 2255 to vacate, set aside or correct her sentence in the underlying criminal matter. In support thereof, the Defendant states as follows:

- 1. On March 23, 2016, the Defendant through her counsel filed a Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by Person in Federal Custody, along with an Assented-to Motion to Stay Proceedings Pursuant to a Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by Person in Federal Custody.
- 2. The Motion to Stay requested that the Court stay this matter for 120 days so that counsel could obtain discovery, conduct an investigation, and to be able to supplement the record in this matter during that time pursuant to his investigation.
 - 3. The 120-day stay will expire on or about June 23, 2016.
- 4. On June 7, 2016, counsel for the Defendant received the requested discovery from the United States Attorney's Office. There are approximately 1,562 pages of discovery for defense counsel to review.

- 5. As such, counsel for the Defendant is requesting that this matter be stayed for an additional six months to allow review of the discovery, to conduct an investigation, and to prepare any necessary pleadings.
- 6. Counsel for the government, Seth Aframe, Esq., assents to the relief requested herein.

WHEREFORE, the Defendant requests that this Honorable Court:

- A. Stay this matter for an additional six months;
- B. Allow the Defendant to supplement the record as described; and
- C. Grant such other and further relief as the justice requires.

Respectfully submitted,

Lisa Biron
By and through her counsel,

/s/Charles J. Keefe

Charles J. Keefe (N.H. Bar No. 14209) Wilson, Bush, Durkin & Keefe, P.C. 184 Main Street, Suite 222 Nashua, NH 03060 (603) 595-0007 keefe@wbdklaw.com

Certificate of Service

I, Charles J. Keefe, hereby certify that on June 8, 2016, true copies of the above document were served upon AUSA Seth Aframe of the United States Attorney's Office for the District of New Hampshire by ECF.

/s/Charles J. Keefe

Charles J. Keefe